

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 11
:
BRUCE KING REDDING, JR. : BANKR. NO. 21-11430 (MDC)
:
Debtor :
:
:

**UNITED STATES TRUSTEE'S RESPONSE TO DEBTOR'S APPLICATION
TO EMPLOY BIELLI AND KLAUDER, LLC. AS COUNSEL UNDER SECTION 327 (a)
OF THE BANKRUPTCY CODE**

The United States Trustee (“UST”), by and through his counsel hereby responds to the Debtor’s Application to Employ Bielli and Klauder, LLC. as Counsel under Section 327(a) of the Bankruptcy Code, said response being based on the following:

1. Andrew R. Vara is the United States trustee for Region 3.
2. The UST has standing to be heard under Section 307 and 28 U.S.C. Section 586(a).
3. The debtor filed a petition for relief under Chapter 11 on May 19, 2021.
4. The debtor filed an application asking the Court’s permission to employ Bielli and Klauder, LLC to represent the debtor in this bankruptcy case under Section 327(a) of the Bankruptcy Code.
5. Thomas Bielli’s Declaration attached to the Application discloses that the debtor paid \$6,738 as an advance retainer and to pay the filing fee. The debtor also agreed to pay an additional \$10,000 by June 16, 2021.
6. The Declaration does not identify from what source the funds would be paid to the firm and what would happen if the debtor does not make the payment.

7. The UST objects to post petition payment to the proposed professional in this case without further disclosure and prior court approval of a motion to make such payment.

WHEREFORE, the United States trustee requests a hearing on the matter.

Respectfully submitted,

ANDREW R. VARA
United States Trustee
For Regions 3 and 9

Dated: June 1, 2021

By: /s/ Kevin P. Callahan
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